

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
JOANN, Inc., <i>et al.</i> ,)	Case No. 25-10068 (CTG)
Wind-Down Debtors ¹ .)	(Jointly Administered)

**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICE OF THE GUC TRUSTEE**

PLEASE TAKE NOTICE that, pursuant to Rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure, each of the undersigned counsel hereby appears on behalf of Steven Balasiano of MHR Advisory Group, LLC, not individually, but solely in his capacity as trustee of the general unsecured creditors' trust (the "GUC Trustee") in the above-referenced cases, and requests copies of all notices, pleadings, orders, and other documents brought before this Court with respect to the above-captioned proceedings, whether formal or informal, be served on the GUC Trustee by and through his counsel as follows:

Bradford J. Sandler, Esq.	Eric R. Wilson, Esq. (<i>pro hac vice</i>)
James E. O'Neill, Esq.	Maeghan J. McLoughlin, Esq. (<i>pro hac vice</i>)
PACHULSKI STANG ZIEHL & JONES	Charles J. Fendrych (<i>pro hac vice</i> forthcoming)
919 North Market Street, 17th Floor	KELLEY DRYE & WARREN LLP
P.O. Box 8705	3 World Trade Center
Wilmington, DE 19899-8705	175 Greenwich Street
(Courier 19801)	New York, NY 10007
Telephone: (302) 652-4100	Telephone: (212) 808-7800
Facsimile: (302) 652-4400	Facsimile: (212) 808-7897
E-mail: bsandler@pszjlaw.com	E-mail: mmcoughlin@kelleydrye.com
joneill@pszjlaw.com	cfendrych@kelleydrye.com
	kdwbankruptcydepartment@kelleydrye.com

¹ The Wind-Down Debtors in these chapter 11 cases are: JOANN Inc.; Needle Holdings LLC; Jo-Ann Stores, LLC; Creative Tech Solutions LLC; Creativebug, LLC; WeaveUp, Inc.; JAS Aviation, LLC; joann.com, LLC; JOANN Ditto Holdings Inc.; Dittopatterns LLC; JOANN Holdings 1, LLC; JOANN Holdings 2, LLC; and Jo-Ann Stores Support Center, Inc.

PLEASE TAKE FURTHER NOTICE that this request includes, without limitation (i) all notices and papers referred to in Bankruptcy Rules 2002, 3017, 9007, 9010 and 1109(b), (ii) all notices of hearings and entry of orders, (iii) every order signed in these cases, and (iv) every pleading or report filed in these cases, including, without limitation, schedules, statements of affairs, operating reports, motions, applications, complaints, demands, requests, petitions, plans of reorganization, disclosure statements, answering or reply papers, and memorandum briefs in support of any of the foregoing.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any prior or later appearance, pleading, claim, or suit shall waive any right of the GUC Trustee to (1) have final orders in non-core matters entered only after de novo review by a District Court judge, (2) trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (4) any objection to the jurisdiction of the Bankruptcy Court for any purpose, (5) any election of remedy, or (6) any other right(s), claim(s), defense(s), setoff(s) or recoupment(s), under agreements, in law, in equity, or otherwise, all of which are expressly reserved.

Dated: July 24, 2025

Respectfully submitted,

PACHULSKI STANG ZIEHL & JONES, LLP

/s/ James E. O'Neill

Bradford J. Sandler, Esq.
James E. O'Neill, Esq.
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: bsandler@pszjlaw.com
joneill@pszjlaw.com

-and-

KELLEY DRYE & WARREN LLP

Eric R. Wilson (*pro hac vice*)
Maeghan J. McLoughlin (*pro hac vice*)
Charles J. Fendrych(*pro hac vice* forthcoming)
3 World Trade Center
175 Greenwich Street
New York, New York 10007
Tel: (212) 808-7800
Fax: (212) 808-7897
Email: EWilson@KelleyDrye.com
MMcloughlin@kelleydrye.com
CFendrych@kelleydrye.com

*Counsel to Steven Balasiano, solely in his capacity as the
GUC Trustee*